

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA

In re:)	
)	Case No. 24-30168
Stark Energy, Inc.,)	Chapter 11, Subchapter V
)	
Debtor.)	

DECLARATION OF ROBERT FETTIG IN SUPPORT OF DEBTOR'S
OBJECTION TO REGION BANK'S MOTION TO LIFT AUTOMATIC STAY

I, Robert Fettig, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the president and sole shareholder of the Debtor in the above captioned case and am personally familiar with the facts as stated herein.
2. I am confident that we will have an effective plan of reorganization for the Debtor. I started the company in April of 2017 with one truck and a trailer. Prior to this, I worked in the oil and gas industry for 5.5 years. In 2017, the Debtor's first year of operation, the company grossed \$176,000. The Debtor acquired a flatbed trailer for hauling pipe/materials in 2018, additional trailers in 2019 for hauling aggregate, and a hydrovac in 2022 for spill cleanups and tank cleanings, and other equipment for drilling services. The Debtor ended 2018 with gross revenues of \$1.65 million. In 2019, the Debtor grossed \$4.85 million with the full utilization of the vehicles now in the possession of the Bank. I believe that, over time, I can return the company to these levels of revenues and that I can operate the company profitably.
3. I understand the need to provide adequate protection for the secured creditors. To this end, the Debtor has been making monthly adequate protection payments to the creditors that have requested such payments.

4. The Debtor has accepted the Court's prior finding but respectfully asserts that it has shown good faith at all times during the course of this bankruptcy proceeding and, although it lost a significant portion of its equipment as a result of the relief from the automatic stay that was granted to Gate City Bank, it has worked diligently to re-build its business.

5. The Western North Dakota oil business is now coming out of its winter slow period. I am a hard worker. I have maintained my customer base and am working that customer base to produce revenue.

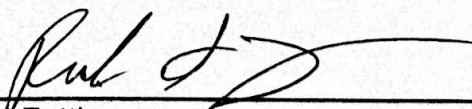
6. I am confident that the Debtor, if allowed to continue its business under a plan of reorganization, will have the means to propose and confirm an effective plan to repay its creditors.

7. I firmly believe that our plan or reorganization will be more beneficial to the creditors than liquidation.

8. The Debtor has retained an accountant to complete tax returns and, by the time of the hearing, I believe we will have filed at least the first of those tax returns.

I declare under penalty of perjury that the foregoing is true and correct.

Date: February 4, 2025



Robert Fettig